

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: LOIS M. SMITH	:	CHAPTER 13
Debtor	:	
	:	
vs.	:	
	:	
JP MORGAN CHASE BANK NA,	:	
Respondent	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Objectant	:	
	:	
vs.	:	
	:	
LOIS M. SMITH	:	
Respondent	:	CASE NO. 1-13-bk-04105-RNO

TRUSTEE'S OBJECTION TO MOTION TO SELL REAL ESTATE

AND NOW, this 4th day of October, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by and through his attorney, James K. Jones, and objects to debtor's Motion to Sell Real Estate for the following reasons:

1. Objectant, Charles J. DeHart, III, is the duly appointed Chapter 13 Trustee in this case.
2. Respondent, Lois M. Smith, is the debtor in this case.
3. Respondent filed an Amended Motion to Sell Real Estate regarding the real estate known and designated as 1965 Limestone Drive, Hummelstown, PA (Docket #52).
4. The motion does not direct that non-exempt equity be paid to the Trustee for distribution to unsecured creditors in this case.

WHEREFORE, Trustee respectfully requests this Court to direct that non-exempt equity realized in the sale be paid to the Trustee for disbursement to unsecured claims.

Respectfully submitted,

Charles J. Dehart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717)566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 4th day of October, 2017, I hereby certify that I have served the within Objection electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

James H. Turner, Esquire  
4701 North Front Street  
Harrisburg, PA 17110

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee